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From: Jacob Odekirk
To: Viswanathan, Krishna; McFadden, Kelly
Cc: Steve Henson; Thomas Mosher; Meyer, Dan
Subject: Kiln 6 Permit Modification Application
Date: Thursday, April 09, 2020 1:50:49 PM

Krishna and Kelly,

Thank you both for providing us with an update on EPA's current position on our requested changes to the Kiln 6 PSD and mNSR permits. Based on our discussions yesterday, EPA indicated there two potential incompleteness items related to the requested permit revisions. As we indicated on the call, the current status of the economy is having significant effects on mill operations and our need to revise the Kiln 6 permits as quickly and efficiently as possible. To assist in that effort we address both of EPA's potential incompleteness items in our responses below.

1. Kiln-Wide Average Exit Temperature Limit

   The permit application requested the Kiln 6 exiting air temperature limit be revised from a zone-specific limit of 245 F to kiln-wide average exit air temperature limit of 265 F to allow for a margin of compliance safety. In order to expedite EPA's processing of our requested permit revisions, PotlatchDeltic is willing to accept the kiln-wide average exit air temperature limit of 245 F that we discussed yesterday. This should resolve the potential incompleteness item related to the exit temperature increasing from 245 F.

2. PM2.5 Modeling Analysis Should Include 2019 Background Data

   After our discussions yesterday, we reached out to Idaho DEQ to obtain the 2019 PM2.5 monitoring data for St. Maries, Idaho. Idaho DEQ staff indicated they submitted the preliminary 2019 monitoring data to EPA as required (90 days after 4Q 2019), but the 2019 monitoring data have not been fully QA'd or certified yet. The data will likely be certified sometime in May if there are no further delays in reviewing the data as a result of COVID19 (i.e., stay at home orders).

   Using non-certified monitoring data in the modeling analysis should not be required as the 2019 monitoring data can change as a result of DEQ's review and certification process. We request this incompleteness item be removed from EPA's letter as the certified 2019 monitoring data are not yet available. EPA delaying the processing of the permit revisions for at least another 30 days (~30 days until the certified data are available, additional time to prepare a new modeling analysis, and additional time for EPA to review the new modeling analysis) is unreasonable because the modeling analysis we submitted to EPA includes the most recent certified PM2.5 monitoring data. The permit application we submitted to EPA includes a PM2.5 modeling analysis using the latest three-years of certified PM2.5 monitoring data indicating the requested permit revisions will not cause or contribute to a PM2.5 NAAQS violation.

Let me know if you would like to discuss these topics any further.

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